



Stantec New Zealand

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22 January 2024

Enquiries: Jessica Grinter
Project No: 310003315

Environment Southland
Cnr Price St & North Rd, Private Bag 90116
Invercargill 9840

Attention: Ryan Hodgson

Dear Ryan

RE: Blue Sky Meats Consent Application (APP-2022295) - Review of s92 Response

As you are aware, our assistance was sought in August 2022 to review specific technical aspects of a consent application submitted by Mitchell Daysh on behalf of Blue Sky Meats (N.Z.) Limited (trading as 'Blue Sky Pastures (BSP)'). The original application was submitted to Environment Southland on 30 June 2022. We subsequently provided a request for further information to be provided by the applicant in accordance with Section 92 of the *Resource Management Act 1991*, on 28 October 2022.

The applicant responded to the request for information on 21 August 2023, and after several discussions a further tranche of information was also submitted on 8 September 2023. We have subsequently conducted a technical review of the applicant's response as per your formal request received on 21 November 2023.

The scope for this review was limited to the following aspects of the application, and only those issues previously raised in accordance with s92 of the RMA:

- Discharges to land
- Discharges to surface water
- Groundwater takes from confined aquifer

We understand that all other aspects, including air quality / odour effects associated with the application to discharge contaminants to air, are being addressed separately by ES and/or third party consultants.

We raised a total of 76 issues requiring further information to be provided by the applicant in our initial review (October 2022). In general, the applicant has made a considerable effort to address these queries. The following materials were submitted and have now been reviewed:

- Report prepared by Pattle Delamore Partners (PDP) entitled 'Consent Application [APP-2022295] – Response to Stantec (NZ) Ltd Request for Clarification (dated 1 November 2022) – Environment Southland', July 2023. Appendices to the report:
 - Updated proposed consent conditions
 - Table addressing Issue ID 23, referenced as "Any draft conditions proposed should have been cross-referenced in Table 17 as key mitigation measures"
 - Updated Wastewater Farm Environmental Management Plan
 - Wastewater Treatment Plant Operation and Maintenance Manual

Design with community in mind

- Completed s92 issues register (including original requests and subsequent response(s) from the applicant) dated 8 September 2023.

The materials were reviewed by our team as follows (with initials provided in the attached spreadsheet, in case specific follow-up discussions with the person involved are required):

- Hydrogeology – Dr Hisham Zarour (HZ)
- Aquatic ecology – David Cameron (DC)
- Land disposal, water quality and human health – Sue Bennett (SB)
- Water quality, environmental effects & other issues not categorised above – Jessica Grinter (JG)

The following four issues remain unresolved following our review of the latest response provided including the materials listed above:

- Issue 6 (and Issue 28) – more information is required regarding the historic damage to soils and how this has been and will be initially remediated prior to commencing further discharges under the new consents. Specifically, the expected timeframe for the soil to be sufficiently remediated to properly receive and treat the applied load of wastewater and solids.
- Issue 32 – incorrect question sent to applicant previously. This question should have been as follows (and has not been addressed by material supplied to date):

Please provide detail regarding how the identified risk will be mitigated. For example, are there long term agreements in place with the third parties owning irrigation land, to allow the operation to continue for the proposed consent term (at minimum)? What measures are in place to avoid restriction of access to this land? Are there any contingencies in the event the third party owned land can no longer be used?

- Issue 65 - Applicant to check data for total phosphorus at bore MW1D Downgradient as the data provided appears incorrect.

We are expecting a response from the applicant as soon as possible to address Issues 32 and 65. A response to Issues 6 and 28 would be very helpful, but if this is not received we are happy to proceed without it (we will provide discussion and recommendations in the technical memorandum).

Following completion of this review, we will now prepare a Technical Review Memorandum as previously agreed. We intend for a draft of the memorandum to be available for your review in the week ending 16 February 2024. We will remain in contact with you directly regarding delivery of the document and any questions you may have regarding the attached review record.

Please do not hesitate to contact the undersigned if you have any queries.

Yours sincerely

Stantec New Zealand



Jessica Grinter
Principal Environmental Scientist

Encl (Full list of s92 issues and responses, including current status following our latest review: [s92\(2\) RFI response APP-20222295 Stantec fnl 22-1-2024.xlsx](#))